



U.S. Department of Justice

United States Attorney
Southern District of New York

One St. Andrew's Plaza
New York, New York 10007

January 31, 2020

VIA ECF

The Honorable Kimba M. Wood
United States District Judge
Southern District of New York
500 Pearl St.
New York, NY 10007

Re: *United States v. Todd Kozel*
19 Cr. 460 (KMW)

Dear Judge Wood:

I write respectfully to request an extension of the Government's response date to the defendant's pending motion for a Bill of Particulars and Motion to Dismiss (the "Motions"). Currently, the Government's Motion responses are due February 6, 2020, and defendant's replies are due February 20, 2020. (Dkt. No. 42).

The reason for the adjournment request is that the parties have entered into discussions that may result in the potential resolution of the charges in this case. Accordingly, to facilitate these discussions, the Government respectfully requests that the Government's Motions response date be adjourned to March 5, 2020, and the defendant's reply date to March 19, 2020.

The Government further requests that the Court exclude time under the Speedy Trial Act through the briefing dates set by the Court. The undersigned has conferred with counsel for the defendant, and he consents to this request, including exclusion of time while the Motions are pending.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

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